

James H. Power
Lissa D. Schaupp
HOLLAND & KNIGHT LLP
195 Broadway
New York, NY 10007
(212) 513-3200

ATTORNEYS FOR DEFENDANT
BEIJING SHOURONG FORWARDING SERVICE CO. LTD.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THELMA SHIPPING CO. LTD.,

Plaintiff,

-against-

BEIJING SHOU-RONG FORWARDING SERVICE
CO. LTD. a/k/a BEIJING SHOURONG
FORWARDING SERVICE CO. LTD.,

Defendant.

08 Civ. 1804 (PAC)

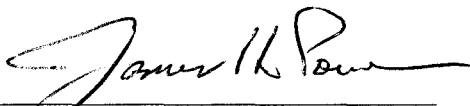
NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Affidavit of James H. Power dated March 27, 2008, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Beijing Shourong Forwarding Service Co. Ltd. will move this Court, before the Honorable Paul A. Crotty, United States District Judge, at 500 Pearl Street, Courtroom 20C, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(7)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing (a) Plaintiff Thelma Shipping Co. Ltd. to give security to the Defendant for the damages demanded in the Defendant's counterclaim within 10 days from the

issuance of the order; and (b) directing such other and further relief as the Court may deem proper. °

Dated: New York, New York
March 27, 2008

HOLLAND & KNIGHT LLP

By: 

James H. Power
Lissa D. Schaupp
195 Broadway
New York, New York 10007
(212) 513-3200
james.power@hklaw.com
Attorneys for Defendant
Beijing Shourong Forwarding Service Co.
Ltd.

TO: LENNON, MURPHY & LENNON, LLC
Attorneys for Plaintiff
The GrayBar Building
420 Lexington Ave., Suite 300
New York, New York 10170
(212) 490-6050
Attn: Patrick F. Lennon, Esq.

5228448_v1